

From: "Michelle@vtnohunger.org%inter2" <Michelle@vtnohunger.org>
Subject: Comments on 2007 Farm Bill
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December 22, 2005

Secretary of Agriculture Mike Johanns: Farm Bill

1400 Independence Avenue, SW

Washington, DC 20250-3355

By email: FarmBill@usda.gov

Re: 2007 Farm Bill

Dear Mr. Johanns:

On behalf of the Vermont Campaign to End Childhood Hunger I am pleased to offer comments and suggestions for the 2007 Farm Bill. The Farm Bill affords a crucial opportunity to improve the food and nutrition safety net for our most vulnerable citizens, and we are hopeful that USDA will take this opportunity to bring positive change to one of our strongest tools for preventing childhood hunger â?? the Food Stamp Program.

The Vermont Campaign to End Childhood Hunger, (â??VTCECHâ??) develops programs and advocates for policies to prevent hunger and promote good nutrition for Vermontâ??s families. We also facilitate Vermontâ??s state-wide Food Stamp Work Group which brings together state agency staff, community outreach groups and advocates from all areas of Vermont. The Food Stamp Program is crucial to Vermont children and families who are making the transition from poverty to self-sufficiency. However, we estimate that Vermontâ??s food stamp program is reaching as few as half of the households eligible for benefits. Increasing outreach and making the Food Stamp program more accessible is crucial to the goal of helping low income families in Vermont.

In the upcoming Farm Bill, VTCECH strongly urges the USDA to retain a strong outreach component to the Food Stamp Program, and also to protect the programâ??s structure, to increase benefit allotments, and to continue simplifying the program. In addition, we support the implementation of a new name which will help to de-stigmatize the FSP for all eligible participants.

1) Protecting Program Structure:

We strongly support the entitlement nature of the Food Stamp Program and urge the USDA to protect the program from structural change in clear and direct language in the 2007 Farm Bill. The entitlement structure of the FSP allows the program to respond to increased need when national or local economic conditions deteriorate or disasters occur. Indeed, this flexibility was instrumental in allowing the program to respond promptly to changing circumstances in the wake of Hurricane Katrina. This is a true strength of the Food Stamp Program and must be preserved.

2) Strengthening Allotments:

• The current minimum FS allotment is \$10/month. Larger households are penalized under the current program rules as they do not always qualify for the full minimum allotment. We urge USDA to increase the minimum allotment for all households to keep pace with rising food prices and inflation, setting a minimum of at least \$25/ month. We also encourage new statutory language that would allow larger households to qualify for at least the full minimum allotment. Finally, we encourage the USDA to allow all Categorically Eligible households to receive at least the full minimum allotment in order to encourage full participation in the program.

• Currently the FSP makes use of the Thrifty Food Plan to set FS allotments; this results in a benefit amount which is insufficient for most households to cover their food costs, especially in a rural state such as Vermont where higher-than-average costs of transportation and fuel are passed forward to consumers through increased food prices. We urge the USDA to shift from a benefit calculation using the Thrifty Food Plan to a use of the Moderate or Low-Cost Food Plan, to raise allotments system-wide.

3) Improving Deductions:

We urge USDA to make the following changes to available deductions to Food Stamp income:

• Increase the dependent care deduction for all households with dependents

• Provide an option to households to claim a standard medical deduction in lieu of documenting each medical expense

• Increase the earned income deduction to 25%

• Provide a crisis-related adjustment tool for the Standard Utility

Allowance that states can use flexibly to respond to spikes in energy costs such as the rising fuel costs in the wake of Hurricane Katrina.

• Provide a deduction for adoption subsidies

4) Improving Household Composition Rules:

We urge the USDA to make the following changes to household composition rules:

• Allow parents under the age of 22 the option to apply as a separate FS household with their children, when they purchase and prepare meals independently from parents/grandparents in the same home.

5) Program Simplification and Reduction of Stigma

• ABAWD Provisions: To simplify program rules, we urge the USDA to eliminate the restrictions on ABAWD participation after three months, and instead to allow ABAWDS to be treated equally to other participants.

• Immigrant Children: We urge simplification in the rules for immigrant children. Current rules are cumbersome and can lead to the confusing result where a child who received food stamps for several years becomes subject to a 5 year waiting period when s/he turns 18, resulting in a gap in coverage for young people who are most economically vulnerable. Waiting periods should be waived for immigrant children who reach the age of majority but remain income-eligible for food stamps.

• Federal Options Implementation: We encourage the USDA to include in the 2007 Farm Bill a requirement that states implement the following federal options from the 2002 Farm Bill. They are: Semi-Annual Reporting for program participants, Simplified Income and Resource Determinations, Transitional Benefit option for five months, Homeless Shelter Deductions, and Simplified Treatment of Child Support Payments. We believe that implementation of the above options will help states to reduce error rates, will help make the transition to work more successful for households leaving TANF, will reduce paperwork burdens on agency workers and applicants/recipients alike, and will improve access to the Food Stamp Program for all eligible households.

• Program Name: We encourage the USDA to move forward with implementation of a new name for the Food Stamp Program. This past year, the USDA released several proposals for a name-change and called for comments from the community. One suggestion that FNS released which we feel was particularly strong was: "Eat Better Today" using

the initials of the food stamp EBT card. We continue to believe that a new name will help improve participation in the program by reducing stigma associated with the name "food stamps".

In closing, Vermont's Food Stamp Program is vital to family food budgets and communities. Our economy is far from robust, wage levels are often low, and the cost of housing and utilities is soaring. State and local budgets are already stretched thin. The 2007 Farm Bill provides an important opportunity to improve the nation's food and nutrition programs and ensure that they are more accessible to the people who need them. Vermont's more than 46,000 food stamp participants include disabled or elderly adults, low-wage or laid-off workers, and nearly 18,000 children. Low income working parents need nutrition programs to sustain healthier and more productive lives that can lead them and their children out of poverty. The FSP has a ripple effect through the entire economy, and helps to ensure that our most economically vulnerable citizens can protect their health through adequate nutrition, reducing the need for costly medical care to treat illness associated with malnutrition later down the road.

I appreciate the opportunity to share comments on the 2007 Farm Bill with you. Thank you for your commitment to ensuring that low income families are able to meet their basic nutritional needs.

Very Truly Yours,

Robert Dostis, MS, RD

Executive Director

Vermont Campaign to End Childhood Hunger

180 Flynn Avenue, Burlington VT 05401

Phone: 802-865-0255 | Fax: 802-865-0266

<mailto:smylchreest@vtnohunger.org> michelle@vtnohunger.org

<http://www.vtnohunger.org/> www.vtnohunger.org

www.vermontfoodhelp.com